

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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AMERICAN CIVIL LIBERTIES UNION;	)
AMERICAN CIVIL LIBERTIES UNION FOUNDATION; )	
AMERICAN-ARAB ANTI DISCRIMINATION )	
COMMITTEE; GREENPEACE; PEOPLE FOR THE ) Civ. A. No. 1:05-CV-1004 (ESH)	
ETHICAL TREATMENT OF ANIMALS; and )	
UNITED FOR PEACE AND JUSTICE, ) Judge Ellen S. Huvelle	
	)
Plaintiffs,	)
	)
v.	)
	)
FEDERAL BUREAU OF INVESTIGATION; and )	
UNITED STATES DEPARTMENT OF JUSTICE )	
	)
Defendants.	)
	)

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JOINT STATUS REPORT

In follow-up to the Court's in-chambers conference with the parties on July 29, 2005, the parties have conferred and reached agreement on a schedule for the dates on which the Defendants will complete their response to Plaintiffs' FOIA requests at issue in this action as follows:

1. For Plaintiffs' FOIA request for documents related to specific organizations, see Exhibit B to the Declaration of David Hardy (hereafter the "Organization requests"), Defendants will complete their response and any production of documents by October 1, 2005.
2. For Plaintiffs' FOIA request for documents related to the National Joint Terrorism Task Force (NJTTF) and local task forces, see Exhibit A to the Declaration of David Hardy, as narrowed in scope upon discussion by the parties (hereafter the "NJTTF requests"), Defendants will complete their response and any production of documents in connection with this request as

follows:

- (i) By January 6, 2006, for responsive documents related to NJTTF policies, practices, and procedures; and
- (ii) By March 1, 2006, for any remaining documents responsive to this request as narrowed in scope upon discussion between the parties.

3. The parties propose that the Court schedule a status conference two weeks after the production date for the respective requests (*i.e.*, October 1, 2005 and March 1, 2006) to confer with the parties as to whether there will be any litigation concerning the requests and to schedule briefing for any such litigation. If the Defendants' response to these requests is not challenged by the Plaintiffs, the parties would so advise the Court and cancel any scheduled status conference.

4. In any litigation concerning either FOIA request, Defendant FBI wishes to advise the Court of its position that a sample *Vaughn* indices may be necessary and appropriate.

Respectfully Submitted,

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**FOR THE PLAINTIFFS**

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